STIPULATION EXTENDING DEADLINES FOR INITIAL DISCLOSURES JOINT STATUS REPORT, DISCOVERY, DEPOSITIONS, AND EARLY SETTLEMENT – 1 CASE NO. 3:24-CV-05546-DGE

ACKERMANN & TILAJEF, P.C. 2602 N PROCTOR ST., SUITE 205 TACOMA, WASHINGTON 98406 253.625.7720

Pursuant to Federal Rule of Civil Procedure 6(b), the Parties hereby stipulate to and jointly		
request a brief continuance of the early case deadlines set by the Court. In support of this		
stipulation, the Parties state as follows:		
1. The Court issued its Order Regarding Initial Disclosures, Joint Status Report,		
Discovery, Depositions and Early Settlement on July 11, 2024. ECF No. 6. Therein, the Court set		
the following deadlines:		
a. Deadline for FRCP 26(f) Conference – September 25, 2024		
b. Initial Disclosures Pursuant to FRCP 26(a)(1) – October 2, 2024		
c. Combined Joint Status Rep	port and Discovery Plan as Required by FRCP	
26(f) and Local Civil Rule 26(f) – October 9, 2024		
2. The Parties are discussing potential	l resolution of the action through an exchange of	
informal discovery and mediation, and the parties have scheduled a private mediation on		
September 30, 2024.		
3. As such, the Parties respectfully request that the Court extend each of the deadlines		
set forth in the July 11, 2024 Order by 30 days. This stipulation for an extension of time is made		
in good faith and is not made for purposes of undue delay.		
Dated this 12th day of August, 2024.		
Craig J. Ackermann, WSBA #53330 cja@ackermanntilajef.com Brian Denlinger, WSBA #53177 bd@ackermanntilajef.com Avi Kreitenberg, WSBA #53294 ak@ackermanntilajef.com ACKERMANN & TILAJEF, P.C. 2602 N. Proctor St., #205	/s/Darren Feider Darren Feider, WSBA #22430 dfeider@sbj.law Tina Aiken, WSBA #27792 taiken@sbj.law SEBRIS BUSTO JAMES 15375 SE 30th Pl., Ste. 310 Bellevue, WA 98007-6500 Telephone: 425-454-4233 Attorneys for Defendant	

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1	ODDED
$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	<u>ORDER</u>
2	IT IS SO ORDERED.
3	The deadlines are reset as follows:
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5	a. Deadline for FRCP 26(f) Conference – October 25, 2024
6	b. Initial Disclosures Pursuant to FRCP 26(a)(1) – November 1, 2024
7	c. Combined Joint Status Report and Discovery Plan as Required by FRCP
8	26(f) and Local Civil Rule 26(f) – November 8, 2024
9	d. Scheduling Conference is reset for November 15, 2024, at 1:30 p.m. in
10	courtroom B via Zoom before U.S. District Judge David G. Estudillo.
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12	DATED this 14 th day of August, 2024.
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16	David G. Estudillo
17	United States District Judge
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